

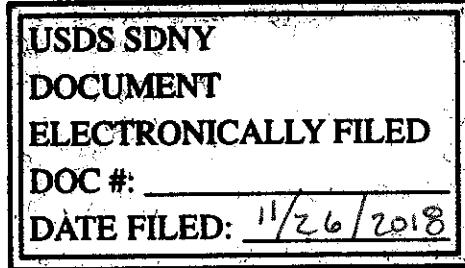
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November 26, 2018

VIA EMAIL

Joshua_Bussen@nysd.uscourts.gov

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom: 12B
New York, NY 10007-1312
Chambers Phone: (212) 805-0222
Deputy Phone: (212) 805-0107



Re: ALLISON HYPOLITE et al. v. HOME HEALTH CARE SERVICES OF NEW YORK INC. et al., 16 Civ. 4922 (JGK)(JLC)

Dear Judge Koeltl:

This firm represents the Plaintiff in the above referenced Fair Labor Standards Act ("FLSA") putative class and collective action. I am writing in response to your request for the total number of hours spent on the case to date, together with counsel's usual billing rate.

The total number of hours spent on this case to date is 502.1 hours. This number is equal to the 624.1 total hours listed on the time records attached as Exhibit C to the Rand Declaration minus the 125 hours of estimated future hours listed on Exhibit C, plus the 3 hours spent since the Declaration preparing for the settlement hearing and speaking with the client.

My usual billing rate is \$450 per hour, but my usual billing rate for large, complex cases is \$550 per hour. The rate to be applied to calculate a lodestar is a rate "in line with ... prevailing [rates] in the community for similar services by lawyers of reasonable comparable skill, expertise and reputation." Blum v. Stenson, 465 U.S. 886, 895 n.11 (1984). Here I believe that \$550 is the prevailing rate in the community for similar services by lawyers of reasonably comparable skill, expertise and reputation. See Brief in Support of Final Approval at pp. 12-13.

Respectfully,

s/William C. Rand

William C. Rand, Esq.

*This letter should be
filed -
so ordered.*

*JGK
11/26/18*

AS.D.O.

cc: Defense Counsel via Email
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